

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

SYMONE MCDANIEL,
on behalf of herself and
all others similarly situated,

Plaintiff,

Case No. 20-cv-1870

v.

THE LAUREATE GROUP, INC., *et. al.*

Defendants

PLAINTIFF'S MOTION FOR APPROVAL OF ATTORNEYS' FEES AND COSTS

NOW COMES Plaintiff, Symone McDaniel, on behalf of herself and all others similarly situated, by and through her counsel, Walcheske & Luzi, LLC, and hereby respectfully Motions this Court for Approval of Attorneys' Fees and Costs on the grounds set forth herein and in the accompanying Declarations.

1. Plaintiff's counsel has achieved substantial and considerable success in this matter – a Fair Labor Standards Act (FLSA) Collective and a Wisconsin Wage Payment and Collection Law (WWPCL) Class – on behalf of one hundred ninety-eight (198) current and former employees of Defendants by negotiating a fair and reasonable settlement of this matter with Defendants' counsel, the terms of which are embodied in the parties' "Settlement Agreement and Release," previously filed with, (ECF No. 19-1), and preliminarily approved by this Court. (ECF No. 20.)

2. Plaintiff's counsel motions this Court for approval of her attorneys' fees and case-related costs and expenses in the total amount of \$21,000.00 in accordance with the agreed-upon terms of the parties' Settlement Agreement (ECF No. 19-1, ¶ 3.2(A));

3. An award of Plaintiff's counsel's attorneys' fees and case-related costs and expenses in the amount of \$21,000.00 will not adversely affect settlement payments to any of the members of the FLSA Collective or WWPCL Class. Rather, Defendants have agreed to pay the amount of attorneys' fees and case-related costs and expenses awarded to Plaintiff's counsel by this Court directly to Plaintiff's counsel; and

4. Defendants do not oppose or dispute Plaintiff's Motion for Approval of Attorneys' Fees and Costs in the total amount of \$21,000.00 (ECF No. 19-1, ¶ 3.2(A).) The parties believe that Plaintiff's Motion for Approval of Attorneys' Fees and Costs is a fair, reasonable, and representative amount of Plaintiff's counsel's actual time and expense spent litigating this matter to date and through completion of the matter.

WHEREFORE, Plaintiff respectfully requests that this Court grant her Motion for Approval of Attorneys' Fees and Costs in the total amount of \$21,000.00 as set forth herein.

Dated this 12th day of November, 2021

WALCHESKE & LUZI, LLC
Counsel for Plaintiff

s/ David M. Potteiger
James A. Walcheske, State Bar No. 1065635
Scott S. Luzi, State Bar No. 1067405
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